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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass
PLAINTIFFS,

vs.

ALAMEDA COUNTY SHERIFF'S
OFFICE, et al

DEFENDANTS.

No. 3:19-cv-07423 JSC

**DECLARATION OF YOLANDA
HUANG IN SUPPORT OF
OPPOSITION TO DEFENDANTS'
REQUEST FOR DEPOSITION OF
MICHAEL LOCKHART, REQUEST
FOR RECONSIDERATION**

LOC.: 450 Golden Gate Ave.,
San Francisco, CA 94102
DEPT.: Courtroom 8, 19th Floor

Hon. Jacqueline S. Corley, Presiding

1 I, Yolanda Huang declare:

2 1. I am one of the counsels for plaintiffs in this matter.

3
4 2. To date, defendants have noticed and taken 11 depositions, including:

5 1. Tiara Arnold

6 2. L. Gerrans

7 3. D. Gonzalez

8 4. C..Henry

9 5. J. Mallet

10 6. D. Misch

11 7. T. Phillips

12 8. E. Rivera

13 9. T. Upshaw

14 10. E. Wayne

15 11. K. Moule

16 3. On September 28, 2023, the parties had a meet and confer regarding deposition scheduling. The
17 matter of Rule 30(a) and the 10 deposition limit arose. Counsel for County defendants stated she
18 would object to any plaintiffs' depositions beyond the statutory limit.

19 4. Thereafter I circulated an email requesting dates and times to meet and confer on this matter. I
20 confirmed that the deposition of Michael Lockhart would number deposition 12. In addition,
21 defendants are demanding a 13th deposition, that of Randy Harris. To date, none of the defense
22 counsels have responded.

23 I make this declaration under penalty of perjury under the laws of the State of California,
24 executed this 29th day of September, 2023 in Berkeley, California.

25
26 /s/ Yolanda Huang
27 Yolanda Huang
28